Kenneth A. Reed 1 Law Offices of Kenneth A Reed 406 West Fourth Street 2 Santa Ana, CA 92701 (714) 953-7400 3 Fax: (714) 953-7412 Kenneth@kennethreedlaw.net 4 5 Attorney for: John Stinson 6 UNITED STATES DISTRICT COURT 7 FOR THE EASTERN DISTRICT OF CALIFORNIA 8 9 UNITED STATES OF AMERICA , 10 Plaintiff,

Case No.: 20-cr-00238-JLT-20

DEFENDANT STINSON'S OPPOSITION TO MOTION TO CONTINUE JURY TRIAL (1360)

VS.

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JOHN STINSON, et al.,

Defendant.

COMES NOW, Defendant, JOHN STINSON, by and through his attorney of record, Kenneth Alan Reed, opposes the motion to continue the January 14, 2025, trial date as to all defendants, jury trial [Doc. 1360] filed by Mr. Perkins and joined by Mr. Bannick in his Joinder [Doc. 1359]. Counsel has no position, nor the standing to assert one, on the issue of severance, but does oppose the granting a continuance of the jury trial.

Because of the time estimate of this jury trial, defense counsel has rescheduled numerous other matters and cleared his calendar in order to conduct a jury trial of this length, in

US v. Stinson Defendant's Stinson's Opposition to (1360) Case No: 20-cr-0238-JLT-20

Case 1:20-cr-00238-JLT-SKO Document 1402 Filed 11/17/24 Page 2 of 2

another federal district not his own. Those complexities have been addressed and counsel has based this calendar jockeying on a jury trial commencement date of January 14, 2025. In addition, many of the counsel's strategic decisions in the defense of Mr. Stinson have been based on previous decisions that the trial court has made in this matter. Counsel would be concerned about the the status of those issues should the matter be continued months into the future.

Finally, Mr. Johnson continues to assert his right to a speedy trial pursuant to the Sixth Amendment. He will be significantly prejudiced by any delay in the trial.

1. Counsel's unavailability for November 18th Court Appearance

Counsel for Mr. Stinson, has a previously scheduled matter here in the Central District of California on November 18, 2024 US vs Seibert, case no. 24-cr-00095-HDV-1 for Change of Plea Counsel cannot attend the hearing on the motion to continue and motion to sever in person. Counsel has contacted counsel for Kenneth Johnson and request that they specially appear on his and Mr. Stinson's behalf¹.

Dated: November 17, 2024

Respectfully Submitted,

Kenneth Reed

Kenneth Alan Reed

Attorney for Defendant John Stinson

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 $^{^{\}rm 1}$ Counsel will be available remotely or by cell phone, could the court need direct contact with Counsel.